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Attorneys for Plaintiffs Marguerite Hiken
and the Military Law Task Force

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARGUERITE HIKEN and
THE MILITARY LAW TASK FORCE,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE and
UNITED STATES CENTRAL COMMAND

Defendants.

)
)
) Case No. CV-06-2812 (MHP)
)
) **JOINT STIPULATION AND MOTION**
) **REGARDING SUBMISSION OF**
) **CROSS-MOTIONS FOR SUMMARY**
) **JUDGMENT**
)
) CASE MANAGEMENT CONFERENCE
) Date: September 13, 2006
) Time: 2:00 p.m.

Subject to the Court's approval and as discussed in the Joint Case Management
Conference Statement, Rule 26(f) Report, and Proposed Order (dkt. no. 9) (July 24, 2006),
plaintiffs Marguerite Hiken and the Military Law Task Force ("plaintiffs") and defendants

Joint Stipulation and Motion Regarding
Submission of Cross- Motions for
Summary Judgment CV-06-2812 (MHP)

1 Department of Defense and United States Central Command (“defendants”), through their
2 undersigned counsel, hereby agree and stipulate as follows:

3 1. Because this case involves claims raised under the Freedom of Information Act
4 (“FOIA”), 5 U.S.C. § 552, the case may be fully and efficiently resolved through the submission
5 of the parties’ cross-motions for summary judgment discussed below.
6

7 2. Submission and briefing of the parties’ cross-motions for summary judgment shall
8 proceed according to the following schedule:
9

10 Defendants’ motion for summary judgment	October 20, 2006
11 Plaintiffs’ opposition to defendants’ motion 12 for summary judgment and cross-motion for 13 summary judgment	November 17, 2006
14 Defendants’ reply in support of their motion 15 for summary judgment and opposition to 16 plaintiffs’ cross-motion for summary 17 judgment	December 15, 2006
18 Plaintiffs’ reply in support of their cross- 19 motion for summary judgment	January 19, 2007

20 WHEREFORE, the parties move jointly for entry of a schedule pertaining to the
21 submission of cross-motions for summary judgment as set forth above.

22 A proposed order is attached.
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1 Dated: August 11, 2006

Respectfully submitted,

2 PETER D. KEISLER
3 Assistant Attorney General

4 KEVIN V. RYAN
5 United States Attorney

6 /s/ Edward H. White
7 ELIZABETH J. SHAPIRO (D.C. Bar No. 418925)
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24 Attorney for Plaintiffs

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28 Joint Stipulation and Motion Regarding
Submission of Cross- Motions for
Summary Judgment CV-06-2812 (MHP)

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARGUERITE HIKEN and
THE MILITARY LAW TASK FORCE,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE and
UNITED STATES CENTRAL COMMAND

Defendants.

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)
) Case No. CV-06-2812 (MHP)
)
)
)
)
) **[PROPOSED] ORDER**
)
)
) CASE MANAGEMENT CONFERENCE
) Date: September 13, 2006
) Time: 2:00 p.m.
)

[PROPOSED] ORDER

Upon consideration of the JOINT STIPULATION AND MOTION REGARDING
SUBMISSION OF CROSS-MOTIONS FOR SUMMARY JUDGMENT, it is hereby
ORDERED that the parties' joint stipulation and motion is GRANTED, and it is
ORDERED that submission and briefing of the parties' cross-motions for summary
judgment shall proceed according to the following schedule:

Defendants' motion for summary judgment	October 20, 2006
Plaintiffs' opposition to defendants' motion for summary judgment and cross-motion for summary judgment	November 17, 2006
Defendants' reply in support of their motion for summary judgment and opposition to plaintiffs' cross-motion for summary judgment	December 15, 2006

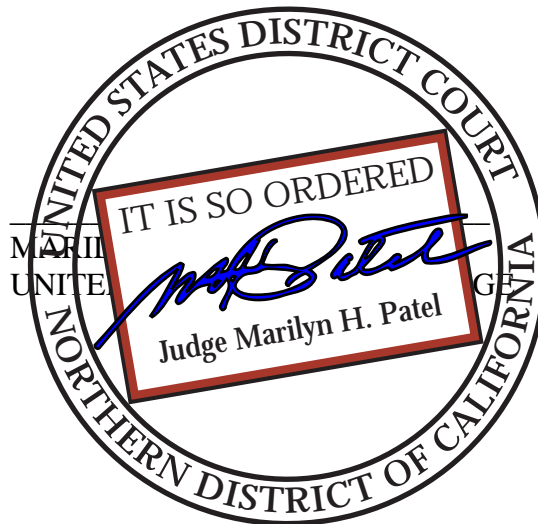
Joint Stipulation and Motion Regarding
Submission of Cross- Motions for
Summary Judgment CV-06-2812 (MHP)

1 Plaintiffs' reply in support of their cross-
2 motion for summary judgment

January 19, 2007

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4 IT IS SO ORDERED.

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6 Dated: August 28, 2006
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28 Joint Stipulation and Motion Regarding
Submission of Cross- Motions for
Summary Judgment CV-06-2812 (MHP)